

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Christopher Gerald Raab aka Christopher G.  
Raab aka Christopher Raab  
Christopher Gerald Raab aka Christopher G.  
Raab aka Christopher Raab**

**Debtor(s)**

**Bayview Loan Servicing, LLC**

**Movant**

**vs.**

**Christopher Gerald Raab aka Christopher G. Raab  
aka Christopher Raab  
Christopher Gerald Raab aka Christopher G. Raab  
aka Christopher Raab**

**Respondent(s)**

**BK NO. 18-17382 REF**

**Chapter 13**

**Hearing Date: 02/21/19**

**OBJECTION OF BAYVIEW LOAN SERVICING, LLC  
TO CONFIRMATION OF CHAPTER 13 PLAN**

Bayview Loan Servicing, LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On January 11, 2019, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$1,421.91.
2. Debtor's Plan provides for payment in the amount of \$899.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$522.91, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Bayview Loan Servicing, LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: February 12, 2019

By: /s/ Kevin G. McDonald, Esquire  
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